



237756



City of Waukegan
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Richard H. Hyde, Mayor
Wayne Motley, City Clerk
Pat Dutcher, Treasurer

February 5, 2007

Mr. Kevin Adler
Remedial Project Manager
USEPA Region V
77 W. Jackson St.
Chicago, Illinois 60604

Sent Via Email

Re: Comments on First Cleanup Plan
USEPA Proposed Plan for OMC Plant 2 Superfund Site

Dear Mr. Adler:

The City of Waukegan appreciates the USEPA's expeditious completion of the Remedial Investigation/Feasibility Study (RI/FS) work at the former OMC Plant 2 site. We further laud USEPA's cooperation in completing Removal Program work during the RI/FS when contaminant sources were identified on the beach area and in site sewer systems.

We have reviewed the first cleanup plan proposed as a result of USEPA's RI/FS findings and offer the following comments for your consideration and review as you further develop the Proposed Clean-up Plan.

1. We appreciate that USEPA has incorporated into the cleanup plan the future residential and recreational/open space land use plans for the OMC site, as defined in the City's Downtown and Lakefront Master Plan. We recommend that as the remedial design/remedial action (RD/RA) plans are developed that the remedy be cognizant of performance-based approaches that may be implemented concurrently with site demolition and phased redevelopment of the site by private sector developers and contractors. While following the overall concepts in the USEPA's 1st Proposed Plan, there may be opportunities to streamline, enhance, or economize the cleanup utilizing the USEPA Explanation of Significant Differences process.
2. Under separate cover, we will send you a copy of the City's draft ECO-Park concept plans. Any on-site disposal and containment remedy must take into account these future site development plans. We have developed our ECO-Park concepts with a cognizance of some on-site disposal/containment, but continued coordination of design will be essential as each plan moves forward. Less emphasis should be placed on creating a disposal area to accommodate Waukegan Harbor dredge sediments, as

that disposal alternative is no longer being sought in the Great Lakes Legacy Act project.

3. We recommend that USEPA's on-site disposal berm area of the OMC site consider the use of a 24" to 36" soil cover system to better accommodate passive recreational/open space uses and to withstand the long-term natural effects of erosion by wind and storm water runoff and animal burrowing that we experience on the lakefront. We recommend that a bottom liner system also be considered in the on-site disposal area.
4. We request that USEPA consider DNAPL source (free product) removal work be incorporated into this First Cleanup Plan work rather than post-poned to the future groundwater cleanup plan. Free-product removal is an important first step in reducing mobility, toxicity risks at the site and will result in a lower cost groundwater remedy.
5. Based on our experience in recently completing demolition of the OMC East Die Cast building, we believe USEPA's demolition cost estimates can be reduced by additional processing and recycling of building and roofing materials. All alternatives to specialized demolition contractor processes for decontamination, processing and material recycling/disposal should be available for implementation within the RD/RA plans.
6. The City continues to request that USEPA consider incorporating alternate treatment/disposal plans for the existing East and West PCB disposal cells into the permanent site-wide remedy for the OMC Plant 2 site.

Thank you for the opportunity to comment. We look forward to continuing to work with USEPA on cleanup and redevelopment of the OMC site.

Sincerely,

City of Waukegan

JM

John H. Moore, P.E.

City Engineer

cc:

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